## MINTZ & GOLD LLP

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December 3, 2020

<u>Via ECF</u> Hon. Loretta A. Preska Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

Re: USA v. Erdal Dere, 20 Cr. 501 (LAP)

Dear Judge Preska:

I represent Erdal Dere in the above referenced case. Mr. Dere seeks to expand his bail limits so he can accompany his wife who wants to have a Christmas visit with her sister in Virginia after the recent death of their mother. The Dere family would travel to Virginia by car and comply with all health requirements. The expected visit would be from December 23 to the 28, but to be safe (and not have to modify this request) I thought it would be prudent to request this expansion to include the period December 20 to 31. The government has no objection to this application. May this letter application be so ordered. Thank you very much.

Respectfully submitted,

Elliot & Sagor

Elliot G. Sagor

Cc: AUSA Jessica Greenwood

The request to modify the conditions of pretrial supervision to permit the above-described travel is approved.

SO ORDERED.

Dated:

December 4, 2020

New York, New York

LORETTA A. PRESKA, U.S.D.J.